

51

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT COURT

United States Courts  
Southern District of Texas  
FILED

NOV 19 2007

Ahmad Jebril

Inmate # 31943-039

Federal Correctional Institution

P O Box 4200

Three Rivers, TX 78071

Michael N. Milby, Clerk of Court

v.

2:07cv436

Dan Joslin (Warden of Three Rivers Federal  
Correctional Institution - Texas)

Joseph Higginson (Captain of Three Rivers  
Federal Correctional Institution - Texas)

C. Eichenlaub (Warden of Milan Federal  
Correctional Institution in Michigan)

Mukhtar Curtis (Head Chaplain of Milan  
Federal Correctional Institution in Michigan)

Jodi Bradley (Captain of Milan Federal Correctional  
Institution in Milan, Michigan)

Case: 2:08-cv-10151

Judge: Battani, Marianne O

Referral MJ: Binder, Charles E

Filed: 01-11-2008 At 11:53 AM

TRANS HC JEBRIL V USA (RRH)

Application For Federal Writ  
Of Habeas Corpus Under 28 U.S.C. § 2241

**PLACE OF CONFINEMENT:**

I'm currently an inmate at Three Rivers Federal Correctional  
Institution in Three Rivers - Texas.

**NAME AND LOCATION OF COURT WHICH ENTERED CURRENT CONVICTION:**

I was convicted in the United States District Court for Eastern  
District Court of Michigan.

Docket #: 05-CP-80175-DT-02 and 03-80810-01.

**BASIS FOR PETITION:**

Basis for this petition relates to prison transfer and prison  
condition.

**NAME AND LOCATION OF THE INSTITUTION WHERE THE INCIDENTS AND/OR  
EVENTS COMPLAINED OF OCCURRED:**

Events originated in Milan. Michigan - FCI and continued on  
to Three Rivers - FCI where I'm currently confined and where  
the matter is still ongoing.

**COMPLAINTS:**

While serving time in Milan FCI I was taken to the Special Housing  
Unit(SHU) for eight months without ~~and~~ due process and then  
ordered transferred to Texas, Three Rivers - FCI a much higher  
security prison outside my region and far from family. In both  
Milan and Three Rivers staff targetted me, bullied me, harassed me  
and discriminated against me.

**GRIEVANCE PROCEDURE:**

On 6/4/07 I filed a request for an informal attempt of an adminis-  
trative remedy.

After Counselor and unit manager returned it on 6/5/07 signed "unable to informally resolve", I then filed a request for administrative remedy to the Warden (BP-9) on 6/6/07. On 6/20/07 Warden Eichenlaub indicated I'm no longer appropriate to be in Milan FCI because he alleges I attempted to organize private religious meetings.

On 6/27/07 I filed an appeal to the regional director (BP-10). I stated more facts and circumstances regarding my transfer and treatment of staff.

On 7/12/07 Regional Director Nally responded "we have reviewed your appeal and determined the Warden's response dated 6/20/07 thoroughly addresses your concerns.

On 8/3/07 I filed an administrative remedy appeal to the central office of the Federal Bureau of Prisons in Washington, D.C.

After I did not receive a response I sent in several letters requesting a response because the response due date of 9/22/07 had passed.

On Oct. 9, 2007 administrator Watts from national inmate appeals responded saying "As noted by the regional Director, based on SIS investigation staff determined you were no longer appropriate for FCI Milan and required greater security".

See ex. b, 7 #1.

**SPECIFICS OF CLAIM(grounds, and supporting facts):**

On 12/11/06 in Milan FCI I was escorted to the special housing unit (SHU) along with my father Musa Jebril #31942-039.

We had absolutely no idea why we were taken to the SHU and all the staff refused to inform me why I was taken to the hole other than a notice they gave me stating that I'm under SIS investigation.

I assumed it was related to conversations and issues I discussed with head chaplain of Milan (Mukhtar Curtis) who was promoting the most radical brand of Islam and I have solid proof of that.

I have in a safe place a book he promoted called (MILESTONES by Sayyid QUTUB) considered the spiritual manifesto of the terrorists and the spark that started the radical and terrorist groups of our time. He was personally handing this book out to inmates to study it and read it. It is stamped with US BOP Milan Chapel's property. I HAVE THIS SOLID EVIDENCE IN A SAFE PLACE. This was one of many issues I was against and spoke to him about.

Exhibit #2 has much more details of most of what transpired between me and Chaplain Mukhtar Curtis.

Knowing that and how evil Mr. Curtis is in how he boasters how his memo's destroy anyone and in fact boasters that it was his memos that destroyed father Howard and sister Pat his co-workers for him to become the head chaplain. Knowing all that about him I assumed it was his memo that put us in the SHU resulting in an SIS investigation.

I pleaded with the staff in the SHU to speak to someone about Curtis before he hides evidence of radical material throughout the prison.

On 12/14/06 I was finally able to speak to SIS - Agent (WEBBER). The meeting lasted less than 5 minutes and he had no interest in what I had to say nor did he officially inform me why I was in the hole.

After listening to what I informed him about Curtis he only asked one question regarding 5 books I had in my property that he thought were radical and according to him I should not of had in Milan. Please see Exhibit #2 for the titles and authors of what Webber assumed were radical books.

On 1/9/07 I arranged through my attorney to meet with my agent and Assistant US attorney Ms. Oberg. I informed them of what I know of Curtis's activities and this was based on my persistent request. In fact the first words Ms. Oberg said was "we are here at your invitation what do you want to tell us".

I spent 8 months in Milan's SHU where I was mistreated, bullied, harassed and taunted by staff there who had been informed that we are terrorists.

The Captain of Milan FCI Jodi Bradley passed my cell telling a SHU officer "You should read the last report we got on Jebril's the terrorists. When he used to see ..... shout Akbar..". The (....) are words I could not make out as she was speaking.

There were times I was deprived of meals and when I asked for it I was informed by staff that "we don't feed terrorists".

I was not given access to my property as others were and most of my property was missing. I have filed a \$1055 tort claim of missing property.

There are countless issues like that.

After 8 months in the SHU I was suddenly informed that I will be transferred to another prison. I was not informed why or where until I stepped foot in Three Rivers, TX - FCI a medium high prison over 35 hours away from my region.

My custody level is 4 points which means I'm at a camp level because anything under 11 points is camp level.

This transfer to a higher security prison was not all they violated me in but they moved me from my region where I was 20 minutes from my house to a prison in TX 35 hours from my house.

This transfer to a higher security prison and 35 hours outside my region is a clear violation of my due process rights because a management variable was placed on my custody level without a disciplinary hearing or any type of notice let alone any elementary procedural due process and this transfer was WITHOUT just cause.

This transfer constitutes cruel and unusual punishment and serves no legitimate regulatory purpose. It is a sanction they imposed on me that constitutes a SEVERE punishment and the transfer along with labeling me a "terrorist" as staff warn inmates about me and mistreat me both in Milan FCI and now here in Three Rivers FCI deprive me of rights I'm entitled to even in my confinement; deprivation of which

of which serves no purpose other than to make my imprisonment more burdensome than law allows and curtails my liberty to greater extent than law permits.

I'm at a medium high prison with inmates of a much higher custody level than me in fact I'm the lowest custody level inmate in the entire prison which is very dangerous because they are all affiliated with groups and gangs and I'm not. They have purposely sought to place me in danger with higher security inmates.

As a result of this transfer my ill mother who never missed a single visit when I was in Milan - FCI is no longer able to visit me due to her health condition as verified in my PSI and due to our financial condition where she could not afford to visit me 35 hours away financially even if her health permitted her.

They could have placed me in a Medium security prison in my region where my mother could visit me but they only sought to inflict harm and punishment that constitutes no legitimate regulatory purpose in effective management of correctional institutions in violations of my rights.

As a result of this transfer I was mistreated in my stay in Milan- SHU and here in Three Rivers TX - FCI staff continue to mistreat me. They bully me, target me, discriminate against me and harass me in the worst way one can imagine. Exhibit # 3 is a letter I wrote to Three Rivers FCI warden regarding mistreatment by his staff only two weeks after I arrived here. The letter served no purpose but to make things worse after it.

Matters have gotten so bad by staff targetting me that I no longer step foot in the chow hall so they stepped up harassment by the metal detector/shack area where I must pass.

I was informed that prior to my arrival on Three Rivers compound a memo was sent to every single staff warning about me that resulted in this type of treatment against me. I would like the court to order discovery of that memo.

Staff in Three Rivers TX have been warning other inmates not to talk to me because I'm bad news and/or a terrorist.

I ask that this unjust transfer be heard before your honorable court and I be permitted to a hearing to show that I belong in a camp in my region and also be given time off due to the mistreatment of staff in both Milan and Three Rivers.

I also ask that discovery of all documentation be presented to the court and myself prior to any hearing that was used to order my transfer, label and mistreat me.

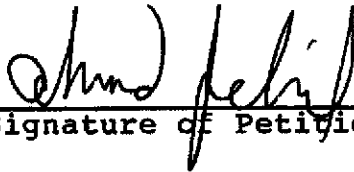
I initiated informal and formal remedies in Milan and continued them during my stay in Three Rivers - TX where I received the final response pertaining to my transfer and discrimination in Three Rivers from the Federal Bureau of Prisons in Washington, D.C. on 10/9/07. Exhibit # 1 are copies that I exhausted all BOP remedies regarding this matter.

I also ask that no retaliatory tactics be used against me for filing this petition by Three Rivers - FCI.  
It is widely known throughout the system that when many remedies or petitions as this are filed the prison transfers the inmate or places them on what's called "diesel therapy" transferring them from one place to another to avoid responding to this or attempting to render it moot.

I ask that if they do any of that, that I proceed with my petition to receive justice unless they place me in a camp prison in my region and stop the discriminatory treatment and the living hell they are putting me through.

I declare under penalty of perjury that the foregoing is true and correct.

11/13/07  
Date

  
Signature of Petitioner

MILSV 606.00 \*  
PAGE 001 OF 001

## MALE CUSTODY CLASSIFICATION FORM

06-25-2007  
09:17:12

## (A) IDENTIFYING DATA

REG NO...: 31943-039

FORM DATE: 12-31-2006

ORG: MIL

NAME....: JEBRIL, AHMAD MUSA

MGTV: NONE

PUB SFTY: NONE

MVED:

## (B) BASE SCORING

DETAINER: (0) NONE

SEVERITY.....: (3) MODERATE

MOS REL.: 35

CRIM HIST SCORE: (02) 2 POINTS

ESCAPES.: (0) NONE

VIOLENCE.....: (0) NONE

VOL SURR: (0) N/A

AGE CATEGORY...: (4) 25 THROUGH 35

EDUC LEV: (0) VERFD HS DEGREE/GED

DRUG/ALC ABUSE.: (0) NEVER/&gt;5 YEARS

## (C) CUSTODY SCORING

TIME SERVED.....: (3) 0-25%

PROG PARTICIPAT: (0) POOR

LIVING SKILLS....: (1) AVERAGE

TYPE DISCIP RPT: (5) NONE

FREQ DISCIP RPT.: (3) NONE

FAMILY/COMMUN...: (4) GOOD

## CUSTODY LEVEL AND CUSTODY SUMMARY ---

BASE CUST VARIANCE	SEC TOTAL	SCORED LEV	MGMT SEC LEVEL	CUSTODY	CONSIDER
+9 +16 -1	+8	MINIMUM	N/A	IN	DECREASE

G5149

INMATE/DESIG FACL LEVEL MISMATCHED, HAVE DSCC ADD A MGTV

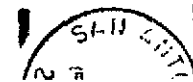
G0005

TRANSACTION SUCCESSFULLY COMPLETED - CONTINUE PROCESSING IF DESIRED

See this

Custody level on 6/25/07  
while I was in the SHU  
(8 points) went down because  
I turned 36 and time served is less  
my age  
I got 4 points.

Aimed April #31943-039  
Federal Correctional Institution  
Box 4200  
Three Rivers, TX 78071



United States Courts  
Southern District of Texas  
FILED

NOV 19 2007

Michael N. Milby, Clerk of Court

CLERK OF THE COURT  
SOUTHERN DISTRICT COURT  
1133 N. Shoreline Dr.  
Corpus Christi, TX 78401

*Legal Mail*

Clerk of The Court  
Southern District Court  
1133 N. Shoreline Dr.  
Corpus Christi, TX 78401

United States Courts  
Southern District of Texas  
FILED

NOV 19 2007

Michael H. Mabry, Clerk of Court

Dear Court Clerk:

Enclosed please find the following:

1) 3 copies of a \$2241 petition "Habeas Corpus" please return a copy to me stamped (filed) in the enclosed self-addressed stamped envelope.

2) Also enclosed are 4 exhibits:

Exhibit #1: Copies of informal and formal remedies as proof that I exhausted all Federal BOP remedies.

Exhibit #2: A detailed letter documenting what transpired between me and Chaplain Mukhtar Curtis of Milan FCI that sparked this transfer and mistreatment I undergo.

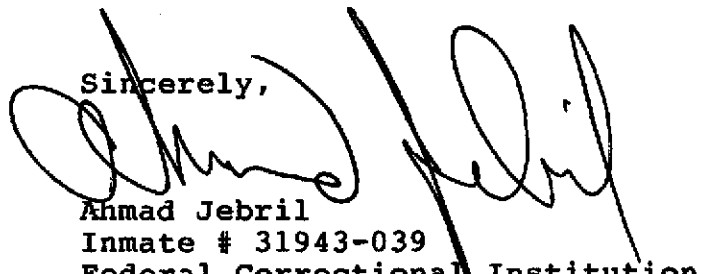
Exhibit #3: A letter to Warden Joslin of Three Rivers - TX where I'm currently serving time regarding mistreatment by his staff only 2 weeks after my arrival. The letter solved nothing but only made matters worse.

Exhibit #4: Memorandum in support of petition.

As to the \$5 fee. Since I'm an inmate and unable to send it my wife has sent it on 11/13/07 and called you numerous times to make sure that she is sending the \$5 fee while I will send the petition from prison in separate envelopes from 2 separate locations. She was informed it was ok to do so and to make a note of it in her letter to you and in my letter to you.

I appreciate your help in this matter.

Sincerely,

  
Ahmad Jebril  
Inmate # 31943-039  
Federal Correctional Institution  
P O Box 4200  
Three Rivers, TX 78071



EXH. B #1

MIL-1330 13c  
12-03-04  
PAGE 7Date Due to Inmate: 6/4/07  
Attachment BFCI/FDC Milan, Michigan  
Request For Administrative Remedy Attempt At Informal ResolutionInmate's Name: Ahmad JebelRegistration Number: 31943-039Unit: F1**TO BE COMPLETED BY INMATE:**

1. Briefly state the complaint - include all details and facts to support the complaint

and request: I was placed in the SHU since 12/1/06 then informedin due to be transferred to another prison and was not informed the reason why I'm being transferred when my family are 20 m away & mother is very ill

2. What action(s) do you wish to be taken to correct the situation:
- I know my transfer is discrim

us a practicing muslim even though I was born here. I ask that I be transferred to a custody level atp since my presence camp otherwise I demand an investigation into the discrimination of my trans

3. Indicate below your efforts to resolve the matter and who you contacted to settle
- which to stay in the

the problem: (Be specific but brief and include names of staff contacted to attempt resolution.) I've spoken to Ms. Wilson who is among those who discrimthen to Ms. Moody who said she'll look into it (Bless her soul). I wanted to make thiswriting because I plan to exhaust my BP's and my attorney is planning a lawsuit ifInmate Signature: Ahmad Jebel Date: 6/4/07 its not solved forI went through in Milan because I'm muslim.**TO BE COMPLETED BY UNIT STAFF:**

4. Attach any pertinent documentation related to the inmate's complaint to the back of this form.

<u>[Signature]</u>	<u>6-5-07</u>	<u>[Signature]</u>	<u>6/5/07</u>
Correctional Counselor	Date	Unit Manager	Date

Date Informally Resolved: N/ADate BP-229 Issued: N/A

If complaint is not informally resolved, original BP-229 and this form are to be forwarded to the DCA/DCA's Secretary.

unable to  
informally  
resolve[Signature]  
6/5/07

Given to inmate on 6/6/07 by [signature]

Type or use ball-point pen. If attachments are needed, submit four copies. Additional instructions on reverse.

From: Tebril Ahman 31943-039 F(10-811) FCI M. L.

LAST NAME, FIRST, MIDDLE INITIAL REG. NO. UNIT INSTITUTION

## Part A- INMATE REQUEST RE: Transfer To Camp Request

I have been discriminated at in Milan-FCI because I'm a known  
 practicing muslim. (I ask that A hold be placed on my transfer till this results  
 on 12/1/06 I was placed in the SHU then 6 months later  
 informed I will be transferred and not informed why!!  
 I have been undergoing a series of discrimination tactics;  
 my classification points are at camp (8 points) if I'm due to  
 transfer I demand to go to my level a camp which I have  
 10 problem with. Otherwise I want to stay in Milan-FCI  
 near my family ending this discrimination of transferring me  
 Sending me to a camp resolves the matter where Milan FCI is happy to go  
 did of me and I'll be where I belong.  
 6/6/07

DATE

(This transfer is not to a camp  
 is Religious profiling)

SIGNATURE OF REQUESTER

## Part B- RESPONSE

If dissatisfied with this response, you may appeal to the Regional Director. Your appeal must be received in the Regional Office within 30 calendar days of the date of this response.

SECOND COPY, RETURN TO INMATE

CASE NUMBER

CASE NUMBER

## Part C- RECEIPT

Return to: LAST NAME, FIRST, MIDDLE INITIAL REG. NO. UNIT INSTITUTION

SUBJECT:

RECIPIENT'S SIGNATURE (STAFF MEMBER)

USP-LYN

BF 229(3)  
APRIL 1992

BP-229 RESI

CASE NUMBER: 454320-F2

U.S. District Court  
Federal Bureau of Prisons  
U.S. District Court  
Federal Bureau of Prisons

Your request for Administrative Remedy (BP-229), dated June 6, 2007, and received in this office on June 11, 2007, has been reviewed. Specifically, you claim you have been discriminated against and you request a transfer to a camp facility or remain at FCI Milan, Michigan.

A review of the issue(s) raised in your BP-229 has been conducted. You have been referred for a transfer as a result of an SIS investigation for attempting to organize private religious meetings at FCI Milan. It has been determined you are no longer appropriate for this institution and require greater security than is available at FCI Milan. You have not provided any evidence that you have been discriminated against because of your religious preference.

Accordingly, your Request for Administrative Remedy is denied. In the event you are not satisfied with this response and wish to appeal, you may do so within 20 calendar days of the date of this response by submitting a BP-230(13) to the Regional Director, Federal Bureau of Prisons, North Central Regional Office, Gateway Complex Tower II, 8<sup>th</sup> Floor, 400 State Avenue, Kansas City, Kansas 66101-2492.

  
C. Eichenlaub, Warden

6/20/07  
Date

received

JMS

Type or use ball-point pen. If attachments are needed, submit four copies. One copy of the completed BP-229(13) including any attachments must be submitted with this appeal.

From: Jebril, Ahmad 31943-039 F1 FCI-M, Ia  
 LAST NAME, FIRST, MIDDLE INITIAL REG. NO. UNIT INSTITUTION

## Part A - REASON FOR APPEAL

The stated reason ordering my transfer (attempting to organize prior Religious meetings) is discriminatory ~~and~~ retaliation and islamophobia lie! I put in 3 official cop-outs specifically asking for monitored multi-faith/interfaith classes to the Muslim Chaplain Imam Mukhtar Curtis. The Chaplain Imam Curtis is a radical jihadist and sympathizer of Al-Qaeda and Hizbullah who I had a fall-out with on Sept 22 06 over him spreading Al-Qaeda radical material and ideology that is 100% Proven fact. He then put in a retaliatory memo fearing for his job and asking for my transfer. I asked for classes in an official + Prop way for interfaith study.

(Continued on Attachment)

6/27/07  
DATE

[Signature]  
SIGNATURE OF REQUESTER

## Part B - RESPONSE

JUL 16 2007  
DATE

SEE ATTACHED RESPONSE

REGIONAL DIRECTOR

If dissatisfied with this response, you may appeal to the General Counsel. Your appeal must be received in the General Counsel's Office within 30 calendar days of the date of this response.

SECOND COPY: RETURN TO INMATE

CASE NUMBER: 454320 R1

## Part C - RECEIPT

CASE NUMBER: \_\_\_\_\_

Return to: \_\_\_\_\_  
 LAST NAME, FIRST, MIDDLE INITIAL REG. NO. UNIT INSTITUTION

SUBJECT: \_\_\_\_\_

\_\_\_\_\_  
DATE

\_\_\_\_\_  
SIGNATURE, RECIPIENT OF REGIONAL APPEAL

USP LVN

BP-230(13)  
JUNE 2002



interfaith meetings pro against radical muslim (perhaps like Imam  
 votes. This outraged him. On 12/10/06 he sympathized me to his  
 office with all 3 cop-out on his desk and he was in a funny  
 age why I as a muslim would understand study with Jews &  
 Christians.

Had I wanted to do a private class(es) I would not place  
 3 cop-out and just for a response. All classes are in Arabic

If that is against Milan policy all they had to do is reject  
 and tell me not to get involved in religious matters and I  
 would accept. Not place me under investigation and transfer me  
 that religious profiling.

I have 18 papers (computer) and if indeed chie (maybe) be a  
 transfer it should be to a camp overseas. I should stay in Milan  
 near my family.

I was never questioned pertaining to anything against me. I feel  
 I should be able to defend myself. The only meeting after my  
 SIS investigation was on 12/14/06 based on my request I gave info on  
 Imam Curtis and was not questioned the meeting lasted 5 minutes.  
 on 1/1/07 I requested to meet with FBI and also gave them info.  
 Imam Curtis and was not questioned as well.

I only found out why I was being transferred on 6/25/07 when enclosed  
 BP 229<sup>13</sup> was returned to me; I also was never informed why I was  
 under investigation until 5/30/07.

This has been an issue of many I faced as a muslim in Milan  
 which I plan to pursue in a federal civil court if I don't  
 get justice.

Thank You

6/27/07

ahm

Enclosed BP 229 (B) & Prison & letter to Child Homeless Secret

**U.S. Department of Justice  
Federal Bureau of Prisons  
North Central Regional Office**

**Regional Administrative Remedy Appeal  
Part B - Response**

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**Admin Remedy Number: 454320-R1**

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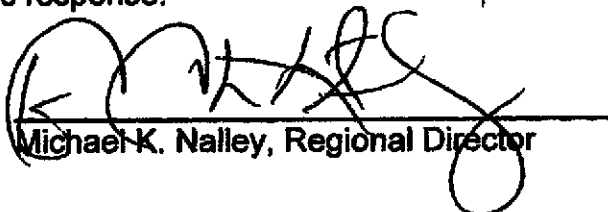
This is in response to your Regional Administrative Remedy Appeal dated June 27, 2007, in which you claim your transfer to another facility is discriminatory and retaliatory in nature due to your Muslim faith. You allege religious profiling due to your submission of three Inmate Request to Staff Member forms to the Chaplain requesting to attend monitored Interfaith religious studies with Jewish and Christian inmates. For relief, you request a transfer to a camp or continued confinement at FCI Milan, a facility close to your family in Michigan.

We have reviewed your appeal and determined the Warden's response dated June 20, 2007, thoroughly addresses your concerns. As indicated in that response, you are pending a transfer as a result of an SIS investigation for attempting to organize private religious meetings at FCI Milan. You have provided insufficient evidence to support your claim that staff have acted in a discriminatory manner or acted outside the scope of national policy.

Based on the above, your Regional Administrative Remedy Appeal is denied.

If you are dissatisfied with this response, you may appeal to the Office of General Counsel, Federal Bureau of Prisons, 320 First Street, NW, Washington, DC 20534. Your appeal must be received in the Office of General Counsel within 30 days from the date of this response.

7/12/07  
Date

  
Michael K. Nalley, Regional Director

## Central Office Administrative Remedy Appeal

point pen. If attachments are needed, submit four copies. One copy each of the completed BP-DIR-9 and BP-DIR-10, including any attachments submitted with this appeal.

Jebail, Ahmad

LAST NAME, FIRST, MIDDLE INITIAL

31943-039

REG. NO.

F1

UNIT

Milan - FCI

INSTITUTION

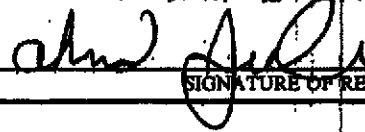
## Part A—REASON FOR APPEAL

Regional did not do anything!

I plead that you re-investigate what SIS investigated. SIS gent webber, the warden, captain and others ordered me transferred based on lies as a cover up because I found out about a terrorist haplain they employ. I held nor attempted to hold private religious classes; I only wrote 3 formal cap-its asking for monitored interfaith meetings. That's wrong with asking that? Where is that a violation of BOP rules. I have 6 custody points & they are sending me to a medium!!! This is outrageous. I did nothing wrong. Please review what I wrote in the BP-DIR 10 as well as attached letter to Chief of Homeland Security to get the general idea. Now CAN YOU PUT ME WITH 6 POINTS in a medium prison by a management available for something I did not do. Please help me get justice otherwise this matter will be in the media and a federal civil court. It's outrageous.

8/3/07

DATE



SIGNATURE OF REQUESTER

## Part B—RESPONSE

RECEIVED

AUG 13 2007

Administrative Remedy Section  
Federal Bureau of Prisons

DATE

ORIGINAL: RETURN TO INMATE

GENERAL COUNSEL

CASE NUMBER:

454320-A

## Part C—RECEIPT

CASE NUMBER:

Return to:

LAST NAME, FIRST, MIDDLE INITIAL

REG. NO.

UNIT

INSTITUTION

SUBJECT:

DATE

SIGNATURE OF RECIPIENT OF CENTRAL OFFICE APPEAL

BP-231(13)  
APRIL 1982

**Administrative Remedy No. 454320-A1**  
**Part B - Response**

This is in response to your Central Office Administrative Remedy Appeal in which you claim you were discriminated against and request to be transferred to a camp or allowed to remain at FCI Milan.

Our review reveals the Warden and Regional Director adequately responded to the issues you raised in your appeal. The issue of transfers is left to the discretion of the Warden and staff at the Designation and Sentence Computation Center per Program Statement 5100.08, Security Designation and Custody Classification Manual. The Bureau of Prisons attempts to designate inmates to facilities as close to their homes as possible commensurate with their security needs. Several factors are considered in redesignations (transfers) from one Bureau institution to another include, but not limited to release residence, population pressures, security level, program needs, and public safety. In addition, the inmate's institutional adjustment and program performance are also carefully reviewed when redesignation is considered.

As noted by the Regional Director, based on SIS Investigation, staff determined you were no longer appropriate for FCI Milan and required greater security. Staff at the Designation and Sentence Computation Center reviewed your case and approved your transfer to FCI Three Rivers. Accordingly, we find you are appropriately designated and therefore concur with the responses provided. We do not find any evidence to support your allegations of discrimination. This response is provided for informational purposes only.

October 9, 2007  
Date

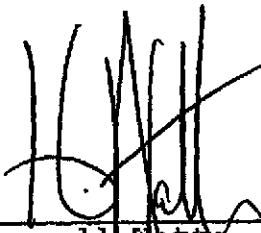

  
Harrell Watts, Administrator  
National Inmate Appeals 



Exhibit #2

This brief is a summary of what occurred in Milan federal prison between myself and the official chaplain there (Imam Mukhtar Curtis).

I'm currently an inmate at Three Rivers - TX Federal Correctional Institute after being transferred from Milan FCI.

My father inmate (Musa Jebril #31942-039) and myself have been convicted on fraud charges. I have an additional jury tampering charges.

This letter relates to radicalization of inmates in Milan Prison by the official prison chaplain named Mukhtar Curtis.

As to my background I'm a Muslim from parents born in Jordan who have been in the U.S.A. in Dearborn, Michigan for over 40 years. I studied and graduated from the Islamic University in Medina - Saudi Arabia. I then attended and graduated from Law School with an L.L.M. (masters of Law) from Wayne State University. I was born in Dearborn, Michigan.

The Islamic University I attended is a (Wahabi/Salafi) school and I have an extensive background in studying under all major Salafi/Waha reference scholars of this age. There is not a single reference of Wahabi school that I have not read or studied.

Upon entering prison I have come to realize that radical/extreme Islam is more dangerous to Islam than it is to anyone else. My ideological transformation is a long story and not the result of prison itself but circumstances in meeting people, reading, and careful thinking.

In March of 2006 I was admitted to Milan's prison. The moment I entered the compound I was greeted by Muslims and asked to be their teacher and preacher.

The Chaplain (Imam Curtis) insisted I do the teachings which were two classes and the Friday sermon based on the inmates request and his desire. The meetings were all conducted in the monitored rooms and were recorded by the chaplain.

During my stay there and teachings there I discovered that Imam Curtis is promoting the most radical brand of Islam.

On or about Sept. 22, 2006 I had a heated discussion with Imam Curtis and told him that I will withdraw to myself and will no longer be part of the Muslim community in Milan.

Between March of 2006 and Sept. of 2006 it became apparent how radical Imam Curtis is and that's based on the following information:

1) Prior to March 2006 I was in the detention center of Milan and I found several video tapes on titled (Beware of the American Holidays) by a Shiekh called Abdul Hakeem Quick with images on the cover bashing a Christmas tree, pumkins....etc.

I took the tape to my cell and when Imam Curtis's co-chaplain (Sister Pat) came in I handed it to her and told her this is inappropriate to be here. She looked at it and agreed. She must of told Chaplain Curtis who came in raging and fuming telling me not to ever talk to the infidel Sister Pat because she wants his job according to him. I did not understand his rage or personality.

At a later point I told him of other videos by Imam Siraj Wahhaj who promoted hatred and even violence in at least two of them against Jews, yet Imam Curtis did not do anything. In fact he approved of them and their topics.

2) My best friend in the detention center was a Jew by the name (Elijah), we grew to be strong friends and our families in the outside world met and exchanged gifts. Imam Curtis always deterred me from befriending Jews.

3) After I went to the prison and became a teacher around March of 2006 it became apparent that Imam Curtis purposely promotes radical Islam and those videos and his comments among other things are not random mistakes but purposely placed there.

In the audio library of Milan's FCI is a series of audio for anyone to check out called (THE LIFE OF ABU BAKR) by ANWAR AWLAKI!!!!

a) The tapes were brought in while I was there around June of 2006 after it was apparent who AWLAKI is and Imam Curtis knew exactly who he was.

b) ANWAR AWLAKI as you know is wanted in connection with 9/11! One of the suicide murderers of 9/11 always attended his class. That should be enough not to promote his tapes especially in prison regardless of what he says in those particular ones.

c) What's more outrageous is that the tapes talk about Abu Baker the #1 man after the Prophet Muhammed! But in them is radical jihadic stories and talk that make a Muslim influenced by them a ticking time bomb eager to become a suicide murderer, or a militant to fight Jews and Christians.

4) In Imam Curtis's offices and right behind his back on the shelf is an Arabic encyclopedia like series called (AL-FATAWA) by the famous Salafi scholar from 7 centuries ago called (IBN TAIMIEH). He has several copies of the 28 volume set throughout the prison. Ibn Taimieh is considered the father of Salafism who is the author of this 28 volume set.

The rulings in them are what Ibn Ladin and Zawahri as well as most terrorists use to back their terrorism in the name of Islam, because he justifies killing innocent people even Muslims let alone non-Muslims and for some reason Ibn Taimieh has credibility among the ignorant masses of the Muslims. There is about 3 volumes on Jihad and many volumes dedicated to how Muslims must separate themselves from others.....etc.

This is right behind his back!! The official BOP chaplain!!

5) Behind his back as well until 12/11/06 when I was placed in the

SHU/Hole was also numerous blue copies of a book called (MILESTONES) by (SAYYID QUTUB).

a) This book is considered by all experts on radical Islam the seed that sparked AL-QAEDA and terrorist groups of our time. In fact its the most dangerous book on radiclizing Muslims.

It's the terrorist spiritual manifesto! Stamped US BOP MILAN FCI!!! PROPERTY!!

What could Ibn Ladin wish for more than a US head Chaplain spreading the MILESTONES paid for by USA funds!!

b) When I initiated teaching (the Sat. classes) I taught physical purification for prayers as well as prayer, the initial years of the Prophet Muhammads life and the attributes of Allah. Imam Curtis asked me to teach Milestones for Qutub instead of what I teach and I refused.

Having those books are not random mistakes he is promoting the most radical brand of Islam there - PURPOSELY!

6) An Inamte On Sept 2006 named Anthony Robinson, inmate # 49759-004, He is a white inamte who is a recent convert to Islam and goes by the name (Muqsit). Anthony Robinson approached me with the book (MILESTONES) by Qutub and was on about p. 23 and told me I've been reading this book what do you think about it?

I read that book back in 1989 and was suprised to see it with him in prison!! I asked how did you get it? He said I asked Imam Curtis to give me something very good to study and he gave me this. I skimmed through the book and found it stampe US BOP Chaplain property in (differemt pages of the book.

I took the book from inmate Robinson and told him not to read it. When he kept asking for it I again brushed him off and did not retur it to him but gave him some moderate Islamic Newspapers instead!

I KNOW WHERE THE BOOK IS TO THIS DAY IN MILAN AND IT'S STORED FOR EVIDENCE!! If you need it let me know!!!

In Sept 2006 it was Ramadan and after breaking our fast I asked Iman Curtis to sit on the side with me and I asked him why are you passing out books like Milestones and even encouraging inamtes to read them while you know they inspire people to join Al-Qaeda when they leave prison.

He said there is nothing wrong with that book and I read it!

After this heated conversation I told him your Wahabi/Salafi books are dangerous and there is one more Friday to Ramadan I'll give that last one and finish the nightly prayers and after that I don't want to be part of your radical Muslim community.

He begged me to stay claiming he's going out of town and needs me to lead Friday prayers for two more weeks but I refused.

7) He runs the prison by 4-5 radical inmates who he informes everything and are hard line gangsters who get incentives and even lie or do anything he tells them!

8) Between March 2006 and Sept 2006 there was also several conversations where I told him his close intimate Shia inmates are promoting Hizbuallah during the 34 day war and some went on to collect donations for them through outside relatives.

Like Awlaki's tapes, Milestones and others he thought it was good and nothing wrong with it.

In fact his close friend inmate Muhammed Khalief who got into numerous problems with other inmates and ran to Imam Curtis to defend him. Rather than take the matter to the C.O.'s, lieutenants or captain to solve the matter the right way. Imam Curtis sent one of his shura member inmates who he runs the prison with to fight the other inmate and put him in check defending Khalief. Once it was regarding an inmate who approached Khalief for sex and another time one who was extorting him.

Inmate Nabhan Isa who is wealthy was talking to Khalief who had convinced him to donate money to Hizbullah through Khalief's brother (SALEEM Khalief). Inmate Isa was to send his wife on one of her visits to Milan, MI from Chicago to meet Saleem Khalief and give him \$3000 to go to Hizbuallah. Isa a Sunni Palestinian was sympathetic to Hizbuallah because of the ongoing 34 day war which Khalief convinced the compound of Muslims are righteous warriors and the angels have been spotted fighting with them according to Jewish papers.

I was against Hizbuallah for many reasons and stood firm against them. When Isa approached me to tell me of the money he plans to send through the Khalief's I tried and pleaded he not do that! I then informed Imam Curtis in front of Isa to help me sway Isa from doing this!! However, Imam Curtis encouraged Isa and praised Mohammed Khalief and Hizbuallah.

I do not know what happened after that because Imam Curtis had told them to keep it confidential and secretive of me.

9) There were other booklets like the (TEN NEGATORS of Islam) by no other than the founder of Wahabism (Muhammad Bin Abdelwahab). More amazing is that the USA asked the Saudi officials to take the negators out of their school curriculum because it's one of the things that breeds radicals and terrorists. YET here in Milan Michigan FCI it's bought and paid for by US funds and passed out inside a USA prison by a chaplain paid for by USA funds.

There was similar talk that I had with Curtis regarding statements like (USA HATES ISLAM) (USA IS PUTTING THE BEST OF THE BEST IN PRISONS) (USA PUT THE BEST SCHOLAR AND MY FRIEND -according to Curtis Ali Tamimi in prison) (USA IS A CRUSADER).....etc and other similar statements.

10) After Sept of 2006 I shun the Muslims for reasons here and due to his obsession in being the leader enforcing his ideas.

From Sept 2006 to Dec. 11, 2006 I wrote Curtis three official cop-outs asking for monitored class rooms independent of his influence except for his monitoring! I specifically have in them I want them to be INTERFAITH for Christians and Jews to bridge the gaps and seek brotherhood among all faiths and sects.

On 12/10/06 after getting my 3rd cop-out he had his gang of thugs who he calls his (shura) or (counsel) escort me forcefully from the yard where I was speaking to inmate (Thomas Valerie) to his office where he was outraged at a few things mainly how I wrote three cop-outs he had on his desk and how dare I ask for interfaith with Jews and Christians splitting the Sunni community in prison. He was fuming in anger telling me I need to declare myself non-Sunni Muslim for asking for interfaith gatherings with non-Muslims because according to him that is against Islam!

Being against interfaith meetings to help understand other faiths and bridging the gaps is against radical/extremist Muslims belief.

Why not ask Imam Curtis to provide you with the three cop-outs that were the issue of our heated conversation the day before he sent me to the SHU/Hole!?!

I ask for interfaith meetings yet get branded a radical, get sent to the HOLE and now taken to a higher security prison 35 hours away from my family!

Yet Imam Curtis who opposes interfaith meetings and was upset at me for asking for such meetings is deemed a moderate working for the US BOP!?!

The cop-outs I sent were before any investigation occurred and they specify multi-faith meetings. That is my true and sincere belief.

11) On 12/11/06 my father who had absolutely no activities on the compound and I were placed in the (hole/Special housing unit/solitary) because Imam Curtis did a pre-emptive strike and wrote a memo of nothing but lies to cover up for himself!

What is clearly outrageous and shows the SIS and anyone else who investigated this is biased and trying to cover up that they have an official US BOP promoting AL-Qaeda and radical Islam is that from March of 2006 TO Sept. of 2006 when I was teaching in monitored rooms I was never investigated because he monitored them and told me he records my classes and speeches.

Yet from Sept 2006 to Dec. 10, 2006 when I did absolutely no teaching but ask for independent monitored interfaith classes (independent of Chaplain Curtis's radical influence) I was placed in the Hole under investigation.

**THE HOLE IS THE PRICE I PAY FOR STANDING UP AGAINST A RADICAL!**

What also needs to be noted is that from March of 2006 to Dec. of 2006 I sent numerous letters to my attorney of what Imam Curtis was doing and asking him to inform my prosecutor or the government to let me wear a wire or a recording device to hear what Chaplain Curtis promotes.

On one occasion my attorney informed me the government is not interested to hear from me.

Also, on 2/28/07<sup>we</sup> were before Judge Gerald Rosen and my attorney Rich Lustig stated on record that he was getting mail from me that is specified as "privileged - attorney client" yet it's open with no letters in them!!!



I assume that Imam Curtis had his freinds in the mailroom track my letters and that's why he did the pre-emptive strike to attempt to declare my father and I radicals to cover up for himself making it appear as though he is moderate and to cover himself of what I was writting to my attorney about his activities.

In a letter in June of 2006 I asked my attorney while I was still in apparent good terms with Curtis to get the government to let me wear a wire or allow me a recorder to hear what he says about Zargawi, Ibn Ladin, Hizbuallah group and others of praise among other things and what he really says about the USA. At that point I really did not want nothing in return for this from the government.

Imam Curtis is obsessed with everything I do like a child. A week before he put us in the hole I left the prison on a writ to take a plea on my 2nd jury tampering charge. After getting back everyone told me Imam Curtis was like a nut running around trying to figure out where you went asking both staff and inmates. He confided in inmate Yousif that he thinks I went before a grand jury to testify against him because he's a real Muslim.

I did meet with my prosecuter and agent after I eagerly sought so to let them hear some of what's in this letter of my side of the story after I was under SIS investigation. I was later told by my attorney that they informed him there is no evidence and when I wrote to him some of what is in this letter based on their request as he claimed he said they responded by saying they don't care about this stuff and that my prosecutor hates me so much and will only get information out of me and not give anything in return as she has done to his other clients in the past -as Lustig claims-.

What must be kept in mind is that I DID NOT mention conversation we had where he was crying over the death of the martyr of our time Zargawi, according to him. Nor did I mention how he asked me to lead a prayer for the dead Zargawi after I finish the Friday praye which I of course refused to do!!

WHAT I DID mention are matters with 100% solid proof and evidence tha does nor require my credibility because I know I lack it as a felon in prison.

They can go to the library in the chapel of Milan's FCI and see Anwar Awlaki's tapes. In his office are more of his tapes!! If he concealed them inmates who work in the chapel library or others who I know were addicted to listening to them will testify the tapes were there.

I can inform you how to obtain the book MILESTONES that he gave to inmate Robinson with the US BOP - Milan stamp on it!

They can ask inmate Robinson how eagerly Imam Curtis wanted him to study Milestones by Qutub.

Another issue brought up was books I had in my posession that ignorant agents like SIS agent Webber, and his captain Jodi claimed are radical. As the saying goes they should never judge a book by it's cover.

Every single book I had was anti-radical unlike what Curtis promotes which are 100% radical.

Every single book was sent to me through Amazon.com a known seller even though Milan allows books in directly from family and I have the receipt for every one of them.

a) The first book is (The Looming Tower and the Road to 9/11 by Wright Lawrence).

I must admit the title to illiterate ignorants who can't flip the pages to read it like the SIS of Milan and anyone else who was involved in the investigation is scary.

However this book is a news oriented book and Lawrence made sure to expose Al Qaeda.

In fact I recall in it's first chapters it was talking about the danger of MILESTONES!!! THE BOOK CURTIS passes out and wants taught!

But because there is so much justice my anti-Milestones book is labeled radical yet Imam Curtis's Milestones is appropriate!

This is scary in that ignorant idiots who can't read the book or it's summary consider it dangerous yet Milestones get's passed out by BOP official.

If these are investigators responsible for the security of this country then may the LORD protect this country because they sure do not know what on earth they are doing compromising the security of this country.

b) The 2nd book is (From Secular to Jihad).

This book talks about Qutub and shows how dangerous he is.

\*I offered both of the these books to Curtis to show him how dangerous what he passes out is and he refused to take them.

c) (Inside Al-Qaeda).

Again this book has a scary title for illiterate investigators who judge a book by it's cover.

If they bothered to read the continuation of the title on the following title pages in small letters it would of said(How I infiltrated the World's Deadliest Terrorist Organization)

This book exposes Al-Qaeda in depth.

The author had plenty of hatred in speaking about a terrorist group he infiltrated while he was reporting about them.

d) (The Road to Al-Qaeda).

This is also a scary title especially when the illiterate investigators probably seen the photos of Ibn Ladin and his right hand man on the cover.

Again had they read the little print the title would of went on to say (The Story of Ibn LADINS Right Hand Man.

The author is an attorney in Egypt named Muntasir Al-Zayyat. He was a radical in prison with Zawahri(Ibn Ladin's right hand man) in the 70's. He turned moderate and exposed his old friend.

The author helped the Egyptian government sign a treaty with Jihadist and helped modernize the Jihadi movement in Egypt and got them to turn their weapons in and gave information on others who were arrested.

The book was pulled off the market in Egypt in Arabic because Zawahri(Ibn Ladin's right hand man threatened this author and his family). The book is now only available in English!

Basically the book exposes Al-Zawahri.

e) (State of Denial - Bush at War by Bob Woodward). This is a news oriented book a top seller in the USA by one of the most famous journalists in America Bob Woodward.

f) (Mein Kampf? by Hitler)  
I had Hitler's famous book and this was the only book I took from Milan's library. This is the only book that I did not own.

I took it from the library to read it. I still have not done so but I certainly plan to read it.

Anyone knows what Hitler stands for and knows that the ideology of Hitler and that of Islam are like oil and water they do not mix.

This is what happened in Milan FCI. I stood against a radical and it costed me 8 months in the hole and instead of being rewarded or thanked I got transferred from a low security prison 20 minutes from home to a higher security (medium high) that's very dangerous and is 35 hours away from home.

Had I not opposed the radical extremist BOP official chaplain I would still be 20 minutes from home enjoying family visits and on my way to a camp because my custody level points are very low (4 points).

My father and I also went an extreme wave of taunting, discrimination and harassment by the C.O's in Milan as well as the captain herself and the chaplain Curtis among others while we were in the SHU in Milan. We were called terrorists; that we don't deserve nothing; I was at time deprived of even food among a variety of other tactics they used on us.

After my transfer to Three Rivers, TX - FCI is still undergo similar harassment, bullying, discrimination and targeting by the great vast majority of the staff here.

Sometimes I wonder was standing up to Curtis the right thing to do?  
It has costed me dearly and had it not been my belief that radicals and terrorist sympathizers like Curtis are dangerous to <sup>my</sup> country I would of regretted it, but I did it out of conviction and belief in that what he was doing was wrong and that brings me peace.

Sincerely,  
Ahmad Jebril #31943-039  
Federal Correctional Institution  
P O Box 4200  
Three Rivers, TX 78071



Exhibit #3

①

8/31/07

Dear Warden of Three Rivers F.C.I.  
Mr. Dan Joslin:

I've been on this compound for approximately weeks and I've been harrassed and discriminated against by nearly the entire staff with the exception of a few.

I know I'm an inmate and would like to be treated as a regular inmate born in Detroit, MI - USA.

Here are just some of the issues I need resolved and looked into:

8/14/07

① My first day on the compound, my first breakfast and meal on the compound a C.O. in the chow hall asked me for my ID. Moments after getting into the unit at around 7:30am a C.O. told me hang up and go to the lieutenants office.

When I arrived there I was told I belong in the SHU and to wait outside until they call me. I waited in the hot sun until 10:30am then was told to go back to the unit. I'm not going to the SHU yet.  
(Your staff is eager to have me in the SHU from before my arrival)

✓ ② On Sat. 8/25/07 at approx. 8:30pm walking back to the yard I bumped into a muslim I seen in Friday services. I gave him Islamic greetings and continued to walk next to him when we reached L.O. Unit he turned right to L.O. B. and I turned left to L.O. A. The next evening ~~the~~ muslim inmate ~~and~~ approached me telling me after count the C.O. (mexican who works L.O. B evenings 4-11pm on Sat, Sun, Thurs...). pulled him out

of the cell and informed him (that he likes him) and to (stay away from me because I'm bad news).

He told another inmate that I'm a (terrorist) and to keep a

③ On Sun 8/26/07 after Dinner at 6:00 pm a C.O. who I was told is a lieutenant stopped me, searched me and told me to hold my arms out in a stretched out position, I did so.

He found 3 pages dated that same day printed off the internet. As he investigated them I dropped my hands because I got tired.

He asked a female C.O. <sup>who looks like a male</sup> and others next to him if I was allowed to have internet papers.

Then asked them how I got it?

Then told me to put my hands up (Did I tell you to put them down) as I put them down to rest them.

He was talking belligerently and in a disrespectful way. Then after the disrespectful manner and rudeness he asked where I got access to the internet.

I said I was just in Chaplain Noble's office and she printed them for me. (Names of ~~the~~ videos she ordered)

I don't mind the search as I'm always a target for that but why be rude, disrespectful and why hold my arms out while he investigates the papers.

I thought holding the arms out in that manner for prolonged periods of time was only done in ABU GHRAIB Iraq Abu

④ I'm always targeted for searches more than possibly any other inmate.

(2)

⑤ I've been to the yard in the late evening about 5 times. They stopped me to take the alcohol test 3 times at the 8:30 pm move.

Check the logs on it.

The only 2 times I was not stoped there was alcohol testing set-up.

3 out of 3! That's RANDOM.

⑥ I been treated and harrassed in many different ways which I can give details to, that's due to a briefing about me by higher authority possibly the Captain or you.

It's not random how I've been treated and It's not random every C.O. here knows my name.

✓ ⑦ On Thurs. 8/30/07 around 12:00 pm I walked into chow and a staff wearing blue trousers and dress-up shirt followed me till I sat. Then he leand <sup>back</sup> on the wall listening to the conversation. I sat with 3 other bla inmates that I don't know. One (who I can identify if I see him again) said brother why is that man starring you down since you walked in, ~~and~~ following and listening? I said (I don't know)!!

When I finished and walked out he said (hey, why is your pants cuffed up?).

I replied (For religious reasons I can't wear pants under my ankle) ~~quietly~~.

He replied (I don't believe you)

I said (I don't care what you believe)

He said (I'll check with the chaplain)

⑤ I stepped outside the chow hall then inside to get his name tag he was not wearing one.

I observed 3 inmates 1 black and 2 mexicans walk with cuffed up pants as he stood there not telling one of the a single word. Your cuffed up pants rule only applies to me because I'm the only one with a religious reason.

⑧ On 8/31/07 I decided to tell the warden (you) as I was speaking to you that staff rudely interrupted us with a sheet of paper (saying inmates must wear their pants below the ankle).

You got hostile and ordered me to violate my religion and uncuff my pants.

I asked you to talk to you.

You said you will not talk to me unless I uncuff my pants, after I told you I can't wear anything below my ankles for religious reasons.

You ordered me again to (sit at the table and uncuff it  
You made me violate my religion!

You may have a policy but just like no one can have hats there is exemptions for religious kufis; exemption of policy for common face meals; exemptions during ram for religious rituals... etc. there is an exemption to allow me to keep my pants uncuffed!! or Above the ankle.

I asked that laundry shorten them to the ankle but you did not compromise nor would you permit me to turn to inwards where cuffs won't show.  
Other inmates walk as we spoke with cuffed pants but neither of you said a word to them.  
You made me violate my religion and I will hold you accountable for this (legally).

(3)

I went to the library and even though it lack Islamic books but for about 7 or 8. I found the most authentic hadith source of Islamic legislation that indi a muslim must wear his pants above the ankle. (Enclosed is p. 397 of Sahih Muslim; Stamped property F.C.I Three Rivers <sup>m-15</sup> Chapel vol III B)

⑧ Inmates I don't know <sup>approached</sup> ~~said~~ ~~(the)~~ me and said (The tall A+W went to their units asking if I attend servi on Friday and what I do in them). He was a bit too ignorant to realize he was asking Nation of Islam members not sunni who I why is he asking? <sup>Isn't there enough cameras to see what I'm doing?</sup> Why is he arising the suspicion of inmates.

⑨ On Mon. 8/27/07 <sup>at 9:00am</sup> I had a call out for property, and in A+O they informed us to bring bags. I asked LOA (my unit) C.O. for a army bag he had to get my stuff. He told me I'll give you one to pack up and get y to the hole. (easier stuff that want me in the SHU) Property C.O. was kind enough to loan me an army bag and as in A+O told me I should have brought one in. I then asked the C.O. at 10:30am for toilet paper. W. had none.

He smurked and said Counselor give that not me. Our counselor was off and we had no toilet paper. I then ~~seen~~ seen an inmate with 2 rolls; I asked how got it, he said from the same C.O. who denied me.

Warden

I have a white collar, non-violent case, there is not a single inmate on your compound that has a crime as petty and non-violent as my (fraud - Jury) Tampering case.  
~~the details of~~

There is no one on your compound that has a less custody level than me. I got 4 custody level points  
 the details of

I was never informed why I got transferred from a low-20 minutes from home, to 35 hours away to a high medium with 4 camp points!

I demand a hearing so I can know what I did and give my side of the story.

I'm NOT a terrorist! if I was I would not be afraid to say it, but I'm not a Radical, <sup>nor an</sup> extremist nor a terrorist!  
 I'm against that.

I'm not a coward to hide my faith, I will stand up for what I believe as in the parts issue! If I was a terrorist I would say so, you people don't scare me with your illegal, harrassing and discriminati tactics, **BUT I'M NOT A TERRORIST!!!**

I'm against radicals, extremist, and terrorists. I stood against a muslim chaplain in Milan because he was promoting radical books & tapes. So he lied and placed me in SIS I can prove this 100% but no one even asked me or told me anything. If you like to hear my side I can explain.

(4)

There are many other petty instances of C.O. harasser. I don't want to make this any longer for you.

I appreciate a response so I can follow up with regional and general council if this is not resolved.

Again I kindly ask every point be looked into and I be transferred to a camp near home.

In the meantime I will minimize going to your chow hall and depend more on my locker food unless I have to go to avoid you and your staff ordering me to violate my religion and to minimize exposure to your staff so they will not harass, bully and discriminate against me.

You are legally responsible for this.

I'm not the type to disobey any of your rules, I've been down 3 years with only one 300 series phone shot, which was a error I did by mistaking my pac<sup>#</sup> with my dad's and using it. I want to and will obey all rules but I will not ~~be~~ let my rights violated!

Thank You for reading this and I hope I will have justice through you.

Sincerely

Ahmad Jebril  
31943-039



For the record!

P.S. ① If this is your staff's attitude towards me what are you all going to do to me if god forbid I unintentionally make a mistake!!

~~XXXXXXXXXXXX~~

- ② For your information I don't know any Muslim personally. I don't know any one of their names. I greet the ones I see ~~Islamically~~ Islamically and that's it. If I can't talk or greet certain women or so to services let me know, I will not disobey.
- ③ On Sun, 8/26/07 at 4:45 p.m. I had a talk with chaplain Noble and she answered concerns I had and was extremely helpful.

④



Exhibit #4

United States District Court  
Southern District Court

Ahmad Jebril  
Inmate #31943-039  
Federal Correctional Institution  
P O Box 4200  
Three Rivers, TX 78071

v.

Dan Joslin  
(Warden of Three Rivers FCI- Texas)

Joseph Higginson  
(Captain of Three Rivers - FCI)

C. Eichenlaub  
(Warden of Milan FCI - Michigan)

Mukhtar Curtis  
(Head Chaplain of Milan FCI - Michigan)

Jodi Bradley  
(Captain of Milan FCI - Michigan)

BRIEF AND MEMORANDUM  
IN SUPPORT OF §2241 Petition

MEMORANDUM IN SUPPORT OF PETITION

Prisoner is entitled to writ of habeas corpus when though lawfully in custody, he is deprived of some right to which he is lawfully entitled even in his confinement, deprivation of which serves to make his imprisonment more burdensome than law allows or curtails his liberty to greater extent than law permits. Coffin v. Reichard (1944, CA6 Ky) 143 F2d 443, 155 ALR 143.

In my situation not only did the BOP in general and Three Rivers, FCI in specific make my custody burdensome but they violated my essential rights, and went on to harass me every possible way they can targetting me, discriminating against me, bullying me and violating my religious and contitutional rights.

Allegations of single, non-recurring assault of federal prisoner by guard force does not state claim for habeas corpus relief. Allegations for continuous recuring matters as in my situation and condition especially after the fact that I attempted to resolve this in every means available before exhausting BOP remedies before filing this. My attempts went in vain and in fact made the staff treat me even worse.

Mason v. Ciccone (1975, CA8 Mo) 517 F2d 73.

It was error to deny petition seeking habeas corpus relief without requiring answer, where federal inmate claimed he was entitled to notice and hearing regarding proposed transfer from federal reformatory to federal penitentiary; failure to grant either notice or hearing constituted denial fo due process.

Bryant v. Hardy (1973, CA4 Va) 488 F2d 72.

In my case I was placed in the HOLE/SHU in Milan FCI for 8 months and then transferred outside my region 35 hours from home to Three Rivers, FCI who discriminate against me and mistreat me yet not a single hearing was held nor was I told why this went on either in Milan or Three Rivers ignoring my requests to find out what's going on violating my due process rights.

There is federal habeas corpus jurisdiction under 28 USCS § 2241 over complaint of federal prisoner who is challenging not validity of his original conviction by imposition of segregated confinement without elementary procedural due process and without just cause.

McNair v. McCune (1975, CA4 Va) 527 F2d 874

Minimum due process required that District Court conduct in camera review of entire investigation file, not only material relied on to find guilt, to determine whether exculpatory information existed which should have been disclosed to prisoners in disciplinary hearing.

Cambell v. Henman (1991, Ca7 Ill) 931 1212.

Although petitioner's designation as "special offender" did not impede his efforts to attain reduced custody, furloughs, or parole, sufficiently adverse consequences flow from "special offender" designation as to justify due process protection and relief or habeas corpus in line with newly promulgated federal prison procedure.

U S ex rel. Addonizio v. Arnold (1976, MD Pa) 423 F Supp 189.

My due process rights by the federal prisons I was in (Milan & Three Rivers)

their designation, label they placed on me and treatment violated my due process protection. The result of the transfer and it's implication in the treatment I get also violated my civil rights to be treated like any ordinary inmate.

Pretrial detainee is discharged from segregation and his visitation and telephone privileges are restored, where detainee was summarily ordered placed in isolation for 90 days for allegedly attempting to escape and to bribe correctional officer, because sanction imposed constitutes punishment and serves no legitimate regulatory purpose in effective management of correctional institution in violation of substantive due process.

Cullazo-Leon v. U S Bureau of Prisons (1994, DC Puerto Rico) 855 F Supp 530, habeas corpus proceeding, remanded (1995, CA1 Puerto Rico) 51 F3d 315.

The sanctions imposed on me as well by transferring me 35 hours away from my home and region as well the prison staff treatment due to a memo that was sent to them warning of me is a sanction that constitutes a punishment not only without due process but I don't even know why nor was I informed why.

Taking me away from my region and family constitutes a sever punishment and serves no legitimate regulatory purpose in effective management of correctional institution in violation of substantive due process.

Federal inmate's challenge to disciplinary sanctions of transfer plus forfeiture of 150 days of statutory good time must fail, where inmate was found guilty of marijuana use - offense of greatest severity for which he could have suffered forfeiture of all 860 days of good time, because community corrections manager did not inflict cruel and unusual punishment.

Mazzant v. Bogan (1994, ED Mich) 866 F Supp 1029.

The court allowed inmate to petition his disciplinary sanction and transfer as a result of that to determine if it was cruel and unusual.

I had absolutely no disciplinary hearing or notice or process yet I get transferred out of my region to a higher security prison and a much higher level than my appropriate designation which is a camp and I'm treated in the worst way staff can treat me due to whatever they were told and informed about me which I still don't know.

In order to grant relief under 28 USC8 § 2241 petitioner must be in custody within territorial jurisdiction of district court and his custodian must be within reach of its process.

Perez-Jimenez v. Laird (1971, DC Puerto Rico) 325 F Supp 457.

I'm in custody of the district court that I send this petition to and custodian is within reach of its process.

The other previous custodians are named in the suit as possible witnesses to their actions and statements in originating this discriminatory transfer and treatment that I endure, they are essential witnesses who must be named in the petition. Current custodian is within reach of courts process as he is responsible for my present condition and his insistence on this discriminatory transfer and treatment.

Federal prisoner seeking only injunctive relief must first exhaust administrative remedies provided by the Bureau of Prisons, when seeking injunctive relief.

Mourke v. Thompson (1993, CA5 Tex) 11 F3d 47.

Petitioner has exhausted all formal and informal administrative remedies provided by the federal Bureau of Prisons.

Writ of habeas corpus is flexible judicial remedy used to insure that miscarriage of justice within its reach are surfaced and corrected. Gilroy v. Ferra (1982, WD NY) 534 F Supp 321.

There is gross miscarriage of justice within the reach of this district court that can only be corrected by the court through this flexible judicial remedy.

Language of 28 USCS § 2241(a) authorizing writs of habeas corpus to be granted by District Courts "within their respective jurisdictions does not limit District Court's habeas corpus jurisdiction to cases where prisoner seeking relief is confined within its territorial jurisdiction, read literally, language of § 2241(a) requires nothing more than that court issuing writ have jurisdiction over prisoner's custodian; so long as custodian can be reached by service of process, court can issue writ within its jurisdiction requiring that prisoner be brought before court for hearing on his claim, or requiring that he be released outright from custody, even if prisoner himself is confined outside court's territorial jurisdiction. Braden v. 30th Judicial Circuit Court (1973) 410 U S 484, 35 L Ed 2d 443, 93 S Ct. 1123.

If words "within their respective jurisdictions" in 28 USCS § 2241 mean anything more than that the court may act only if it has personal jurisdiction of proper custodian and capacity, within its geographic boundaries, to enforce its orders, physical presence of petitioner within district is not invariable jurisdictional prerequisite, and it gives way in face of other consideration of fairness and convenience. Word v. N. Carolina (1969, CA4 N C) 406 f2d 352.

Habeas corpus is an extraordinary remedy whose operation is to a large extent inhibited by traditional rules of finality and federalism, its use has been limited to cases of special urgency, leaving more conventional remedies for cases in which restraints on liberty are neither severe nor immediate.

Hensley v. Municipal Court, San Jose-Milpitas Judicial Dist. (1973) 411 US 345, 36 L Ed. 2d 294, 93S Ct 1571.

My case and what I went through of transfer and that which I endure is clearly of extreme and special urgency.

Writ of habeas corpus can reach behind prison walls and iron bars, but it is not static, narrow, formalistic, its scope also including protection of individuals against erosion of their right to be free from wrongful restraints upon their liberty.

Jones v. Cunningham (1963) 371 US 236, 9L Ed 2d 285, 83 S ct 373, 92 ALR2d 675.

My petition for 2241 habeas corpus clearly shows wrongful restraints upon my liberty.

Writ of habeas corpus is flexible judicial remedy used to insure that miscarriages of justice within its reach are surfaced and corrected. Gilroy v. Ferro (1982, WD NY) 534 F Supp 321.

Petition will clearly show miscarriages of justice in petitioners situation within the reach of the court.

Exhaustion of administrative remedies is required before habeas relief may be granted.

US ex rel. Carrasquille v. Thomas (1981, SD NY) 527 F Supp 1105, aff'd (1982, CA2 NY) 677 F2d 225.

Petitioner as indicated has exhausted all formal and informal administrative remedies provided by the federal Bureau of Prisons.

Irreparable harm is an excuse to exhaust administrative remedies or if remedies would be futile.

Exhaustion of remedies was not a jurisdictional requirement of § 2241 when one would be irreparably harmed because petitioners originally scheduled graduation date was 5/1/06 and further delay would prevent him from obtaining remedy.

Barq v. Daniels (2006, DC Or) 428 F Supp 2d 1147.

Inmates failure to exhaust remedies would of been futile. She persued action to prevent government from transferring her from community corrections center to federal prison camp.

Ferguson v. Ashcroft (2003, MD La) 248 F Supp 2d 547.

Inmates failure to exhaust his administrative remedies prior to filing his 28 USCS § 2241 petition was excused where not only would administrative appeal have been futile, but without immediate relief by court inmate could have suffered irreparable harm; if inmate had been required to pursue administrative remedies prior to bringing his action, he would likely have been serving much if not all his time and request would become moot.

Pimentel v. Gonzalez (2005, ED NY) 367 F Supp 2d 365.

As previously indicated twice before petitioner did exhaust all administrative remedies, however there are recurring incidents of harassment that I need not exhaust administrative remedies on since I had already done so to the broad issue of harassment, discrimination, bullying and targetting by certain officers. Exhausting administrative remedies on the broad issue and specifying some situation relieves me of having to exhaust the remedies when filing the §2241 petition if some later incidents occur between exhausting my remedies and filing of §2241 if I decide to use some of the specific latter situations in the §2241 petition.

Also, the process of exhausting administrative remedies regarding my transfer from a low prison to a much higher security prison outside my region without any due process and constituting cruel and unusual punishment began while I was in Milan FCI - Michigan. I continued the procedure after being transferred to Three Rivers - FCI in TX. I need not begin the procedure of exhausting the remedy regarding transfer all over after my transfer because the matter is the same and the higher agencies where remedies were sent to would be the same and that would prolong my suffering and be futile.

Prisoner was entitled to habeas relief under 28 USCS § 2241 on his claim which alleged that his constitutional rights were violated when he was removed from his originally assigned class under Bureau of Prisons (BOP) Drug & Alcohol treatment Program (DAP) and placed in another class

that graduated on later date thereby extending his scheduled release date, because it was arbitrary and capricious and abuse of discretion under 5 USCS §706 (2)(a).

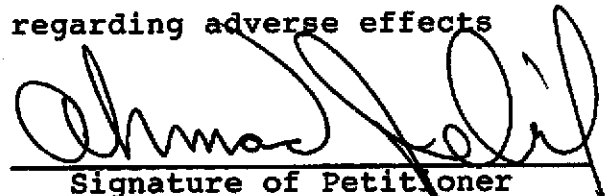
My transfer from Milan FCI in Michigan 20 minutes from my house to a medium Three Rivers, TX - FCI over 35 hours away from my house and region violated my due process rights, constitutional rights and is by no doubt arbitrary and capricious and abuse of discretion.

Federal Court in District of confinement may entertain by habeas corpus state prisoner's challenge to adverse effects or conditions of his confinement resulting from filing of foreign detainer, but challenge in that court to validity of underlying charges fails for lack of in personam jurisdiction over prosecuting officials in demanding state.

Braden v. 30th Judicial Circuit Court (1973) 410 US 484, 35L Ed 2d 443, 93S Ct 1123.

Petitioner seeks relief from this court regarding adverse effects and conditions of confinement.

11/13/07  
Date

  
Signature of Petitioner  
Ahmad Jebril #31943-039  
Federal Correctional Inst.  
P O Box 4200  
Three Rivers, TX 78071

United States Courts  
Southern District of Texas  
FILED

DEC 12 2007

Michael N. Milby, Clerk of Court

Clerk of The court  
Southern District Court  
1133 1/2 N. Shoreline Dr.  
Corpus Christi, TX 78401

Case: 2:07 cv 436


Dear Court Clerk:

On 11/13/07 I sent a formal §2241 petition that was returned to me as FILED on 11/19/07.

On 11/29/07 I recieved an order dated 11/9/07 that I need to use a certain type of form.

On 12/1/07 I sent a letter inquiring if there was an overlap in the mail. Because initially I sent a letter asking for an attorney which was construed as a §2241 petition. After it was denied I sent in a §2241 petition with all esential information of general petitions in it.

Enclosed is a form for §2241 that your court provides that I found in our library.

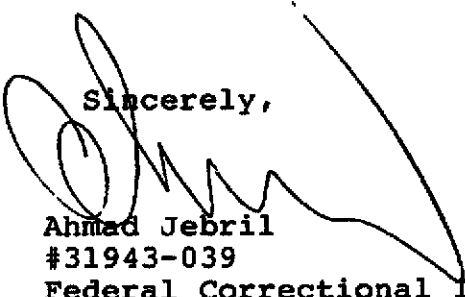
 If my §2241 petition is sufficient that was filed on 11/19/07 then please disregard this!

If my §2241 petition filed on 11/19/07 is not sufficient then please use the enclosed petition.

The reason I'm sending this is because I did not get a response to my questions regarding mail overlapping so I sent this to avoid risking my case being dismissed.

Please keep me informed.

Sincerely,

  
Ahmad Jebril  
#31943-039  
Federal Correctional Institution  
P O Box 4200  
Three Rivers, TX 78071



UNITED STATES DISTRICT COURT FOR THE Southern DISTRICT OF Texas  
DIVISION

**§ 2241 HABEAS CORPUS PETITION FORM**  
**TO BE USED BY PRISONERS IN ACTIONS UNDER 28 U.S.C. § 2241**  
**OR IN ACTIONS CHALLENGING REMOVAL PROCEEDINGS**

United States Courts  
Southern District of Texas  
FILED

DEC 12 2007

Michael N. Milby, Clerk of Court

**Ahmad Jebril**

Inmate/Alien # 31943-039

P O Box 4200  
Three Rivers, TX 78071

Three Rivers - Federal Correctional Institution

(Enter full name of Petitioner,  
prison number or alien [A] number, if applicable,  
AND address of place of confinement.)

vs.

CASE NO: 2:07cv436

Dan Joslin (Warden of Three Rivers FCI) (To be assigned by Clerk)

Joseph Higginson (Captain of Three Rivers FCI)

C. Eichenlaub (Warden of Milan FCI - Michigan)

Mukhtar Curtis (Head Chaplain of Milan FCI - Michigan)

Jodi Brady (Captain of Milan FCI - Milan, Michigan)

(Enter name and title of each Respondent.

If additional space is required, use the blank  
area below and directly to the right.)

**ALL APPLICANTS MUST COMPLETE THIS ENTIRE FORM**



**ANSWER ALL OF THE FOLLOWING:**

1. This petition concerns (check where applicable):

- (a) ☐ a conviction  
 (b) ☐ a sentence  
 (c) ☐ prison disciplinary action or other action resulting in lost gain time credits  
 (d) ☐ parole  
 (e) ☐ immigration/removal  
 (f) ☒ other (explain): **Prison transfer and severe prison conditions in higher security prison**

2. Provide the following information regarding the conviction(s) and sentence(s) for which you are presently incarcerated:

- (a). Name(s) and location(s) of court: **United States District court for Eastern District in Detroit, Michigan**  
 (b) Case Number(s): **05-CR-80175-DT-02 and 03-80810-01**  
 (c). Charge(s) for which you were convicted: **Fraud and jury tampering**

(d). What was your plea? (Check one)

- (1) Not Guilty ☒  
 (2) Guilty ☐  
 (3) Nolo contendere ☐

(e) Did you appeal from the judgment of conviction? Yes ☒ No ☐

3. If you did appeal, answer the following:

- (a) Name of Court: **Sixth Circuit Court of Appeals** Case #: **06-1139**  
 (b) Result: **Pending**  
 (c) Date of opinion and mandate (citation, if known):

4. Claims that challenge your conviction or imposition of sentence can only be raised by motion under 28 U.S.C. § 2255 unless the § 2255 motion is inadequate or ineffective to test the legality of your detention. If any of the grounds raised above challenge your conviction or sentencing:

(a) Have you filed a motion under 28 U.S.C. § 2255?

Yes ☐No ☒

If yes, please provide the case #, where filed, relevant date(s), and the results:

(b). Explain why the remedy under § 2255 was or is inadequate or ineffective: N/A

5 Are you currently represented by counsel in this case or in any other court case?

Yes ☒ No ☐ **Attorney Thomas F. Goeke, Jr. in Covington, KY.**  
If yes, please explain:

6 If this case concerns removal proceedings:

(a) Date of final order of removal: \_\_\_\_\_

(b) Did you file an appeal with the Board of Immigration Appeals? Yes ☐ No ☐

7. In the spaces below, set forth every ground which supports your claim that you are incarcerated unlawfully. Briefly summarize the specific facts in support of each ground raised. Conclusions that are not supported by specific facts are insufficient. You may attach additional pages if necessary to raise additional grounds or provide additional facts. Do not cite any law in your statement of facts

(a) Ground one: **I was held illegally in a SHU-Hole (solitary) for 8 months and to this day I was not informed why. This was in Milan - MI. Please See P. 7 for specifics of claim(grounds & facts)**

Supporting FACTS (state *briefly* without citing cases or law) **~~I was deprived of rights that serve nothing but to make my imprisonment burdensome than law permits without an elementary due process.~~**

Exhaustion:

[1] - Have you presented ground one to the Bureau of Prisons, either through the prison grievance system or other administrative proceeding?

Yes ☒ No ☐

If yes, please provide the results of the proceeding(s) and the relevant date(s). Include any appeals:

**See Exhibit 1 for copies of documents that I exhausted my remedies. They claimed I was under SIS investigation.**

[2]-(Answer only if you are challenging an issue related to removal (immigration) proceedings) - Did you present ground one to the Board of Immigration Appeals? Yes ☐ No ☐  
If yes, please provide the results of the proceeding(s) and the relevant date(s). \_\_\_\_\_

- (b) Ground two: I was transfered from Milan - Michigan 20 minutes from my house to a much higher security prison (Three Rivers - F in TX over 35 hours from my region.  
Please see P. 7 for specifics of claim (grounds and facts)

Supporting FACTS (state *briefly* without citing cases or law): They moved me after taking me out of the SHU. This transfer is unjustified. They placed a mangemen variable to deprive me of going to a camp. My points now are at a c level. Others with my custody points are in camps but they chose to discriminate against me and make my imprisonment as difficult as the can. I'm in a medium prison which endangers my life because I'm not affiliated with gangs nor am I at the level of inmates here. They also deprived my family of seeing me. My ill mother can by no means travel 35 hours nor can she afford it.

Exhaustion:

[1] - Have you presented ground two to the Bureau of Prisons, either through the prison grievance system or other administrative proceeding?

Yes ☒ No ☐

If yes, please provide the results of the proceeding(s) and the relevant date(s). Include any appeals:

See Exhibit 1 of all documentation my me exhausting the administrat remedy proceeding.  
They basically said it's up to the warden to do as he wants.

[2]-(Answer only if you are challenging an issue related to removal (immigration) proceedings) - Did you present ground two to the Board of Immigration Appeals? Yes ☐ No ☐

If yes, please provide the results of the proceeding(s) and the relevant date(s). \_\_\_\_\_

- (c) Ground three: In my stay in Milans SHU while under investigation and after I was transferred to Three Rivers- TX where I currently am I've been trated in the worst manner an inmate can be treated. I've been harassed, bullied, targetted and disoriminated against in different ways and means.  
Please see P. 7 for Specifics of claim(grounds and facts)

Supporting FACTS (state *briefly* without citing cases or law) **This is discrimination violation of my rights and more so violation of human rights.**

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Exhaustion:

[1] - Have you presented ground three to the Bureau of Prisons, either through the prison grievance system or other administrative proceeding?

Yes ☒ No ☐

If yes, please provide the results of the proceeding(s) and the relevant date(s) Include any appeals:

**See Exhibit #1. They did not take time to investigate my situation instead they referred everything back to the rights of the Warden where I'm held.**

[2] - (Answer only if you are challenging an issue related to removal (immigration) proceedings) - Did you present ground three to the Board of Immigration Appeals? Yes ☐ No ☐

If yes, please provide the results of the proceeding(s) and the relevant date(s). \_\_\_\_\_

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(d). Ground four: \_\_\_\_\_

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Supporting FACTS (state *briefly* without citing cases or law): \_\_\_\_\_

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Exhaustion:

[1] - Have you presented ground four to the Bureau of Prisons, either through the prison grievance system or other administrative proceeding?

Yes ☐ No ☐

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT COURT**

**Ahmad Jebril**

Inmate # 31943-039

Federal Correctional Institution

P O Box 4200

Three Rivers, TX 78071

v.

**Dan Joslin** (Warden of Three Rivers Federal  
Correctional Institution - Texas)

**Joseph Higginson** (Captain of Three Rivers  
Federal Correctional Institution - Texas)

**C. Eichenlaub** (Warden of Milan Federal  
Correctional Institution in Michigan)

**Mukhtar Curtis** (Head Chaplain of Milan  
Federal Correctional Institution in Michigan)

**Jodi Bradley** (Captain of Milan Federal Correctional  
Institution in Milan, Michigan)

**Application For Federal Writ  
Of Habeas Corpus Under 28 U.S.C. § 2241**

**PLACE OF CONFINEMENT:**

I'm currently an inmate at Three Rivers Federal Correctional  
Institution in Three Rivers - Texas.

**NAME AND LOCATION OF COURT WHICH ENTERED CURRENT CONVICTION:**

I was convicted in the United States District Court for Eastern  
District Court of Michigan.

Docket #: 05-CV-80175-DT-02 and 03-80810-01.

**BASIS FOR PETITION:**

Basis for this petition relates to prison transfer and prison  
condition.

**NAME AND LOCATION OF THE INSTITUTION WHERE THE INCIDENTS AND/OR  
EVENTS COMPLAINED OF OCCURED:**

Events originated in Milan. Michigan - FCI and continued on  
to Three Rivers - FCI where I'm currently confined and where  
the matter is still ongoing.

**COMPLAINTS:**

While serving time in Milan FCI I was taken to the Special Housing  
Unit(SHU) for eight months without ~~any~~ due process and then  
ordered transferred to Texas, Three Rivers - FCI a much higher  
security prison outside my region and far from family. In both  
Milan and Three Rivers staff targetted me, bullied me, harassed me  
and discriminated against me.

**GRIEVANCE PROCEDURE:**

On 6/4/07 I filed a request for an informal attempt of an adminis-  
trative remedy.

After Counselor and unit manager returned it on 6/5/07 signed "unable to informally resolve", I then filed a request for administrative remedy to the Warden (BP-9) on 6/6/07. On 6/20/07 Warden Eichenlaub indicated I'm no longer appropriate to be in Milan FCI because he alleges I attempted to organize private religious meetings.

On 6/27/07 I filed an appeal to the regional director (BP-10). I stated more facts and circumstances regarding my transfer and treatment of staff.

On 7/12/07 Regional Director Nally responded "we have reviewed your appeal and determined the Warden's response dated 6/20/07 thoroughly addresses your concerns.

On 8/3/07 I filed an administrative remedy appeal to the central office of the Federal Bureau of Prisons in Washington, D.C.

After I did not receive a response I sent in several letters requesting a response because the response due date of 9/22/07 had passed.

On Oct. 9, 2007 administrator Watts from national inmate appeals responded saying "As noted by the regional Director, based on SIS investigation staff determined you were no longer appropriate for FCI Milan and required greater security".

**SPECIFICS OF CLAIM(grounds, and supporting facts):**

On 12/11/06 in Milan FCI I was escorted to the special housing unit (SHU) along with my father Musa Jebril #31942-039. We had absolutely no idea why we were taken to the SHU and all the staff refused to inform my why I was taken to the hole other than a notice they gave me stating that I'm under SIS investigation.

I assumed it was related to conversations and issues I discussed with head chaplain of Milan (Mukhtar Curtis) who was promoting the most radical brand of Islam and I have solid proof of that.

I have in a safe place a book he promoted called (MILESTONES by Sayyid QUTUB) considered the spiritual manifesto of the terrorists and the spark that started the radical and terrorist groups of our time. He was personally handing this book out to inmates to study it and read it. It is stamped with US BOP Milan Chapel's property. I HAVE THIS SOLID EVIDENCE IN A SAFE PLACE. This was one of many issues I was against and spoke to him about. Exhibit #2 has much more details of most of what transpired between me and Chaplain Mukhtar Curtis.

Knowing that and how evil Mr. Curtis is in how he boasters how his memo's destroy anyone and in fact boasters that it was his memos that destroyed father Howard and sister Pat his co-workers for him to become the head chaplain. Knowing all that about him I assumed it was his memo that put us in the SHU resulting in an SIS investigation

I pleaded with the staff in the SHU to speak to someone about Curtis before he hides evidence of radical material throughout the prison.



On 12/14/06 I was finally able to speak to SIS - Agent (WEBBER). The meeting lasted less than 5 minutes and he had no interest in what I had to say nor did he officially inform me why I was in the hole.

After listening to what I informed him about Curtis he only asked one question regarding 5 books I had in my property that he thought were radical and according to him I should not of had in Milan. Please see Exhibit #2 for the titles and authors of what Webber assumed were radical books.

On 1/9/07 I arranged through my attorney to meet with my agent and Assistant US attorney Ms. Oberg. I informed them of what I know of Curtis's activities and this was based on my persistent request. In fact the first words Ms. Oberg said was "we are here at your invitation what do you want to tell us".

I spent 8 months in Milan's SHU where I was mistreated, bullied, harassed and taunted by staff there who had been informed that we are terrorists.

The Captain of Milan FCI Jodi Bradley passed my cell telling a SHU officer "You should read the last report we got on Jebril's the terrorists. When he used to see ..... shout Akbar..". The .... are words I could not make out as she was speaking.

There were times I was deprived of meals and when I asked for it I was informed by staff that "we don't feed terrorists".

I was not given access to my property as others were and most of my property was missing. I have filed a \$1055 tort claim of missing property.

There are countless issues like that.

After 8 months in the SHU I was suddenly informed that I will be transferred to another prison. I was not informed why or where until I stepped foot in Three Rivers, TX - FCI a medium high prison over 35 hours away from my region.

My custody level is 4 points which means I'm at a camp level because anything under 11 points is camp level.

This transfer to a higher security prison was not all they violated me in but they moved me from my region where I was 20 minutes from my house to a prison in TX 35 hours from my house.

This transfer to a higher security prison and 35 hours outside my region is a clear violation of my due process rights because a management variable was placed on my custody level without a disciplinary hearing or any type of notice let alone any elementary procedural due process and this transfer was WITHOUT just cause.

This transfer constitutes cruel and unusual punishment and serves no legitimate regulatory purpose. It is a sanction they imposed on me that constitutes a SEVERE punishment and the transfer along with labeling me a "terrorist" as staff warn inmates about me and mistreat me both in Milan FCI and now here in Three Rivers FCI deprive me of rights I'm entitled to even in my confinement; deprivation of which

of which serves no purpose other than to make my imprisonment more burdensome than law allows and curtails my liberty to greater extent than law permits.

I'm at a medium high prison with inmates of a much higher custody level than me in fact I'm the lowest custody level inmate in the entire prison which is very dangerous because they are all affiliated with groups and gangs and I'm not. They have purposely sought to place me in danger with higher security inmates.

As a result of this transfer my ill mother who never missed a single visit when I was in Milan - FCI is no longer able to visit me due to her health condition as verified in my PSI and due to our financial condition where she could not afford to visit me 35 hours away financially even if her health permitted her.

They could have placed me in a Medium security prison in my region where my mother could visit me but they only sought to inflict harm and punishment that constitutes no legitimate regulatory purpose in effective management of correctional institutions in violations of my rights.

As a result of this transfer I was mistreated in my stay in Milan- SHU and here in Three Rivers TX - FCI staff continue to mistreat me. They bully me, target me, discriminate against me and harass me in the worst way one can imagine. Exhibit # 3 is a letter I wrote to Three Rivers FCI warden regarding mistreatment by his staff only two weeks after I arrived here. The letter served no purpose but to make things worse after it.

Matters have gotten so bad by staff targetting me that I no longer step foot in the chow hall so they stepped up harassment by the metal detector/shack area where I must pass.

I was informed that prior to my arrival on Three Rivers compound a memo was sent to every single staff warning about me that resulted in this type of treatment against me. I would like the court to order discovery of that memo.

Staff in Three Rivers TX have been warning other inmates not to talk to me because I'm bad news and/or a terrorist.

I ask that this unjust transfer be heard before your honorable court and I be permitted to a hearing to show that I belong in a camp in my region and also be given time off due to the mistreatment of staff in both Milan and Three Rivers.

I also ask that discovery of all documentation be presented to the court and myself prior to any hearing that was used to order my transfer, label and mistreat me.

I initiated informal and formal remedies in Milan and continued them during my stay in Three Rivers - TX where I received the final response pertaining to my transfer and discrimination in Three Rivers from the Federal Bureau of Prisons in Washington, D.C. on 10/9/07. Exhibit # 1 are copies that I exhausted all BOP remedies regarding this matter.

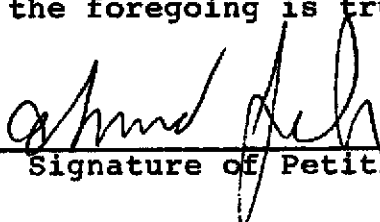
I also ask that no retaliatory tactics be used against me for filing this petition by Three Rivers - FCI.

It is widely known throughout the system that when many remedies or petitions as this are filed the prison transfers the inmate or places them on what's called "diesel therapy" transferring them from one place to another to avoid responding to this or attempting to render it moot.

I ask that if they do any of that, that I proceed with my petition to receive justice unless they place me in a camp prison in my region and stop the discriminatory treatment and the living hell they are putting me through.

I declare under penalty of perjury that the foregoing is true and correct.

11/13/07  
Date

  
Signature of Petitioner

Ahmad Jebri  
#31943-039  
Federal Correctional Institution  
P O Box 4200  
Marine Corps, TX 78071

Legal mail

United States Courts  
Southern District of Texas  
FILED

DEC 12 2007

Michael N. Kirby, Clerk of Court

Clerk of the Court  
Southern District Court  
1133 N. Shoreline Dr.  
Corpus Christi, TX 78401

78401+2003 0022

11/11/08 11:11 AM

